

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
: :  
Timothy D. Williams : No. 19-15679-AMC  
Debtor : :

ANSWER TO MOTION OF PENNYMAC LOAN SERVICES, LLC.  
FOR RELIEF FROM THE AUTOMATIC STAY

Debtor, by Attorney David M. Offen respectfully submits the following:

The debtor admits to missing payments. The debtor inherited this property along with other family members and he wishes to retain the property. The debtor has been in contact with Pennymac Loan Services, LLC to request a loan modification and asks for the chance to catch up the arrears utilizing the same.

WHEREFORE, the Debtor respectfully requests that the Movant's Motion for Relief be DENIED.

Respectfully submitted,

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor

Dated: 7/14/20

CERTIFICATE OF SERVICE

The following has been served by electronic mail:

Rebecca A. Solarz on behalf of Pennymac Loan Services, LLC.

Bankruptcy@kmlawgroup.com

/s/ David M. Offen  
David M. Offen  
Attorney for Debtor

Dated: 7/14/20